

# **EXHIBIT**

**18**

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION

NATIONAL ASSOCIATION FOR THE  
ADVANCEMENT OF COLORED PEOPLE,  
INC., *et al.*,

Plaintiffs,

v.

CITY OF MYRTLE BEACH, *et al.*,

Defendants.

Civil Action No. 4:18-cv-00554-DCC

**DECLARATION OF VIOLET LUCAS**

I, Violet L. Lucas, hereby state as follows:

1. I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth herein.
2. I am a resident of Georgetown, SC. I have lived in the Myrtle Beach area since 1994.
3. I am an African American female, who is also a Biker, attending the event since the early 1990's.
4. I submitted a prior declaration in this case [Doc. 24-14], but I am submitting another one to further discuss the traffic loop instituted by the City of Myrtle Beach during Memorial Bike Festival.
5. In my prior declaration, I stated that "we as bikers do not support the traffic loop," by that, I meant that the loop is an inconvenience to the bikers, the residents, and those who work within the City of Myrtle Beach.
6. I believe that the traffic loop implemented by the City of Myrtle Beach in its planning phase failed to include us as bikers, who are also tourists, this exclusion makes our visit less

inviting and enjoyable, taking away from the nearly 4 decade tradition and culture of the Memorial Bike Festival.

7. The City of Myrtle Beach's 23 mile traffic loop takes away from our experience as Memorial Bike Festival (also referred to as Black Bike Week) attendees and discourages us from an event that is meant to be a celebration, the traffic loop creates a huge inconvenience by routing bikers outside of the city limits and away from the event. We're stuck in stand still traffic with no exit, which forces us to do what is called "ride the clutch and throttle" creating a rider safety hazard, mechanical break downs and overheating of our motorcycles because our motorcycles are not designed to sit in a 23-mile loop traffic at a standstill.

8. As bikers, we do not want the traffic loop, and feel it is unfair that the City impose these restrictions during the Memorial Bike Festival with no exemption for motorcyclists.


9. I feel the traffic loop is an inconvenience to the Residents of the City of Myrtle Beach, and those who work within the Myrtle Beach City Limits who are not participants of the Memorial Bike Festival as they too are held captive between the hours of 10pm and 2am, unable to navigate through the City without going through the traffic loop.

10. Myrtle Beach is a tourism economy and the attendees of the Memorial Bike Festival (also referred to as Black Bike Week) are predominantly African American bikers, who are also tourists that bring a lot of revenue to the City of Myrtle Beach, as tourists who visit the City of Myrtle Beach during the Memorial Bike Festival, we should be considered in the City's plan as welcomed guests, and if there is a traffic loop in what is deemed as our event, the bikers should be given special access to navigate through the City. .

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED WITHIN THE UNITED STATES ON: April <sup>10<sup>th</sup></sup> 10, 2018.

BY:

  
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Violet L. Lucas